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ATTORNEY FOR DEFENDANT
Shalom Ifrah

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHALOM, IFRAH,

Defendant.

CASE NO. 2:22-CR-0046-WBS

**STIPULATION TO REMOVE DRUG TESTING
AS A CONDTION OF RELEASE;
DECLARATION OF DAVID E. KENNER;
CONDITIONS OF RELEASE ATTACHED AS
EXHIBIT A**

**ORDER LODGED
HEREWITH**

STIPULATION

COMES NOW the defendant Shalom Ifra, by and through counsel, David E. Kenner, and hereby moves the Court for an order removing the pretrial condition of release, number 12, which currently requires drug testing. (See Exhibit A).

Defendant Ifrah has been on drug testing since his release on bond, from April 6, 2022, to present. Mr. Ifrah has never had a “dirty test,” and has now tested clean for over three years.

I have forwarded a copy of this request to Mr. Ifrah’s pretrial services officer, Margarita Zepeda, who has no objection to this order being granted. I have also provided a copy of this motion to U.S. Attorney, Michele Beckwith, as well as to U.S. Attorney Roger Yang, and U.S. Attorney Kevin Khasigian. Each also has no objection.

DECLARATION OF DAVID KENNER

1. I am over the age of 18 and I reside in Los Angeles County.
2. I am an Attorney duly licensed to practice law in the State of California.
3. Defendant Ifrah has been on drug testing since his release on bond, from April 6, 2022 to present.
4. Mr. Ifrah has never had a “dirty test,” and has now tested clean for over three years.
5. I have forwarded a copy of this request to Mr. Ifrah’s pretrial services officer, Margarita Zepeda.
6. I have also provided a copy of this motion to U.S. Attorney, Michele Beckwith, as well as to U.S. Attorney Roger Yang, and to AUSA Kevin Khasigian. Each also has no objection hereto.

I declare the above to be true and correct under, pursuant to the laws of the United States of America, this 25th day of June, 2025, at Encino, California.

David Kenner
Attorney for Shalom Ifrah

1 **IT IS SO STIPULATED.**

2
3 /s/

4 Roger Yang
Assistant United States Attorney

5
6 /s/

7 David Kenner
Attorney for Defendant
Shalom Ifrah

8
9 /s/

10 Carolina Valencia-Diaz
Signature of Bond for Release,
11 Acknowledgement of Changes to Conditions of Release

12
13 /s/

14 Yakoc Cohen
Signature of Bond for Release,
15 Acknowledgement of Changes to Conditions of Release

IT IS SO ORDERED

Dated: June 30, 2025



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I do hereby declare that I am employed by the County of Los Angeles, State of California, am over the age of 18 years, and am no party to this within action. My business address is 16633 Ventura Blvd, Suite 735, Encino, CA 91436.

On April 22, 2025, I served the following document described as: STIPULATION TO SUSPEND DRUG TESTING AS A CONDTION OF RELEASE in this action as follows:

STIPULATION TO REMOVE DRUG TESTING AS A CONDTION OF RELEASE

1 [] BY U.S. MAIL; I placed such envelope(s) addressed as shown below, with
2 postage fully prepaid, in a United States Postal service mailbox in Encino, California, for
3 collection and mailing.

4 [X] VIA FACSIMILE: I caused such document to be served via facsimile to the
5 addressee(s) and number(s) shown below.

6 [X] VIA EMAIL TO U.S. Attorney Roger Yang @ roger.yang@usdoj.gov

7 I declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct.

9 Steve McClain